

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

DRAFT

Title V, Operating

Permit: V-08-023

IPSCO Tubulars (Kentucky) Inc.

Wilder, KY 41071

11/06/08

Yelena Goldin, Reviewer

SOURCE ID: 21-037-00006

AGENCY INTEREST: 613

ACTIVITY: APE20080001

SOURCE DESCRIPTION:

On May 30, 2008, the source applied to the Division for the renewal of the operating permit of the facility in Wilder, Kentucky for the manufacturing of steel pipes and tubes. IPSCO Tubular purchases high quality hot rolled steel coils.

The manufacturing process begins by feeding these steel coils into the material handling equipment of either the 8" or 16" Pipe Mill where they are cold-formed into a tubular configuration.

The resultant tube is in-line welded by a high frequency electric resistance welder and cut into designated lengths. The pipe is inspected, tested, and coated with a varnish if required. Welded tubular products range in size from 4.5 to 16.0 inches in outside diameter.

Based on their criteria air pollutants emissions, the plant requires a Title V permit. This facility is currently located in an ozone non-attainment area.

Regulation 401 KAR 50:012 is applicable because the source is located in a county which is designated ozone nonattainment and is major source for VOC. The determination of reasonably available control technology is based upon control techniques which are mentioned in the permit concerning exemptions from Section 3 of 401 KAR 61:132 and 59:225 as well as applicability of 401 KAR 59:185.

COMMENTS:

Emission Point #8: Continuous steel pipe coating using a clear coat lacquer to coat pipes between 4" and 8" diameter, with a maximum usage of 50,000 gallons of clear coat per year. Potential criteria air pollutants emissions (PTE) were calculated based on the maximum usage rate of 50,000 gallons, which source has provided.

No specific control equipment is required to be used at this point. In order to be exempt from Section 3 of 401 KAR 61:132, permittee shall only apply clear coats with a VOC content that is less than 0.52 kg/l of coating (four and three-tenths (4.3) lb/gal), excluding water or exempt solvent or both, delivered to applicators associated with clear coat.

Emission Point #9: Continuous steel pipe coating using a clear coat lacquer to coat pipes between 4" and 16" diameter, with a potential to emit of 76.1 tons per year.

In order to be exempt from Section 3 of 401 KAR 59:225, the permittee shall only apply clear coats with a VOC content that is less than 0.52 kg/l of coating (four and three-tenths (4.3) lb/gal), excluding water or exempt solvent or both, delivered to applicators associated with clear coat.

The permit has required the emissions from this point to stay below 76.1 tons per year to preclude

the construction of this unit from being consider a major modification to a major source in a nonattainment area. Capture percentage will not be consider in the calculation unless it is measurable.

Emission Point #10: Onsite landfill used for industrial waste.

Only fugitive particulate emissions are generated at this point. The only requirement for this activity is that the dust emissions be kept to a minimum and that no household garbage be included in the landfill. Emission factors used were based on numbers presented by the company and the SCC units used are tons of slag processed.

Emissions Point #11: Haul roads, paved and unpaved.

Only fugitive particulate emissions are generated at this point. The only requirement for this point is that the dust emissions be kept to a minimum through the watering of unpaved roads and keeping paved roads clean. Emission factors used were based on numbers presented by the company and the SCC units used are tons of steel produced, since the road usage will depend on the production rate of the plant.

Emission Point #14: Parts Washers (12).

To prevent the applicability of the control requirements per 401 KAR 59:185, New solvent metal cleaning equipment. Applicable to affected facilities commenced on or after June 29, 1979 located in a county designated in 401 KAR 51:010 as nonattainment for ozone for any classification except marginal, the following conditions shall be satisfied for these units:

- * The cold cleaner shall have a remote solvent reservoir.
- * Cold cleaners shall not use a solvent with a vapor pressure that exceeds one (1.0) mm Hg (0.019 psi) measured at 20° C (68°F).
- * The cold cleaner solvent shall not be heated above 120°F.
- * The sink-like work area shall have an open drain area less than 100 sq. cm.
- * Evidence shall be provided that waste solvent shall be stored properly and disposed of with minimal loss due to evaporation.

Emission point #15: Cooling towers (2)

No chromium-based water treatment chemicals shall be used in the industrial process cooling towers.

EMISSION AND OPERATING CAPS DESCRIPTION:

See comment of each source description.

PERIODIC MONITORING:

The permittee shall monitor the amount and type of coating and solvent used at the point of application, including exempt compounds daily. The total coating usage shall be calculated by taking the total clear coat lacquer input to this emission point and subtracting any lacquer recovered from this emission point, up to a maximum of 10 percent of the lacquer input.

The permittee shall monitor the VOC content as applied in each coating and solvent.

The permittee shall monitor the amount and type of clean-up, or wash-up solvent (including exempt compounds) used and the VOC content of each daily.

OPERATIONAL FLEXIBILITY:

NA

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.